Kevin L. Sink

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Counsel to Glenmoor Limited Partnership

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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE: \$ Chapter 11

S CIRCUIT CITY STORES, INC., et al. \$ Case No. 08-35653-KRH

Debtors. \$ Jointly Administered

MOTION OF A. CARTER MAGEE, JR. FOR AN ORDER AUTHORIZING KEVIN L. SINK TO APPEAR *PRO HAC VICE* PURSUANT TO LOCAL BANKRUPTCY RULE 2090-1(E)(2)

A. Carter Magee, Jr. (the "Movant"), a member in good standing of the Bar of the Commonwealth of Virginia, an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia (the "Court"), and a partner with Magee Goldstein Lasky & Sayers, P.C., hereby moves this Court to enter an order authorizing Kevin L. Sink to appear *pro hac vice* before this Court on behalf of the Glenmoor Limited Partnership in the above-captioned Chapter 11 cases and any related adversary proceedings, and in support hereof, states as follows:

1. Pursuant to Local Bankruptcy Rule 2090-1-(E)(2)(a), an Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2)(a) for Mr. Sink is appended hereto as Exhibit A and incorporated by reference herein.



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ATTORNEYS AND COUNSELORS AT LAW

Case 08-35653-KRH Doc 12057 Filed 06/21/12 Entered 06/21/12 18:30:19 Desc Main Document Page 2 of 4

2. Mr. Sink is admitted, practicing, and in good standing as a member of the bar of the State of North Carolina, the Court of Appeals for the Fourth Circuit, and the United States District Courts for the Eastern, Middle, and Western Districts of North Carolina. Mr. Sink has been practicing law since 1994. There are no disciplinary proceedings pending against him.

3. Movant requests that this Court admit Mr. Sink to appear *pro hac vice* before this Court for the purpose of appearing as counsel in this case and any related proceedings on behalf of Glenmoor Limited Partnership.

4. Movant shall serve as co-counsel to Mr. Sink in this case and any related adversary proceedings.

5. Pursuant to Local Bankruptcy Rule 9013-1(G), and because there are no novel issues of law presented in this Motion, the Movant requests that this Court waive the requirement that all motions be accompanied by a written memorandum of law.

6. Pursuant to Local Bankruptcy Rule 9013-1(L), and because this motion does not present contested issues, Movant requests that this Court rule on the motion without an oral hearing.

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WHEREFORE, Movant respectfully requests that this Court enter an order substantially in the form annexed hereto (i) authorizing Kevin L. Sink to appear *pro hac vice* in association with the Movant as Counsel to Glenmoor Limited Partnership in connection with the above-captioned chapter 11 cases and (ii) granting such other and further relief as is just and proper.

Dated: June 21, 2012 Respectfully submitted,

/s/ A. Carter Magee, Jr.
A. Carter Magee, Jr., Esq. (VSB #20284)
Kent P. Woods (VSB #82824)
Garren R. Laymon (VSB #75112)
Magee Goldstein Lasky & Sayers, P.C.
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Phone: (540) 343-9800 Fax: (540) 343-9898

CERTIFICATE OF SERVICE

I certify that on June 21, 2012, I filed the foregoing document with the clerk's office for the Bankruptcy Court, which caused electronic notice to be delivered to all registered users of the CM/ECF system who have filed a notice of appearance in this case.

By: /s/ A. Carter Magee, Jr.

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EXHIBIT A

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: <u>08-35653 (KRH)</u> ,*	Case Name:	Circuit City	Stores,	Inc.	et al.

PERSONAL STATEMENT

FULL NAME: Kevin L. Sink
Bar Identification Number: 21041
Firm Name: Nicholls & Crampton, P.A.
Firm Phone: (919) 827-0994
E-Mail Address: ksink@nichollscrampton.com
Office Mailing Address: P.O. Box 18237, Raleigh, NC 27619
Name(s) of federal court(s) in which I have been admitted: <u>United States Court of Appeals for the Fourth Circuit</u> , <u>United States District Court for the Eastern, Middle, and Western Districts of North Carolina</u> .
I certify that the rules of the federal court in the district in which I maintain my office extend a similar pro hac vice admission privilege to members of the bar of the Eastern District of Virginia.
I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.
I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.
/s/ Kevin L. Sink Kevin L. Sink
I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant pro hac vice.
/s/ A. Carter Magee, Jr. (Signature) June 21, 2012 (Date)
A. Carter Magee, Jr. (Typed or Printed Name)
*Pro hac vice admission in a case shall include an adversary proceeding(s) in the case.

MAGEE GOLDSTEIN LASKY & SAYERS &

Roanoke, Virginia 24003-0404 540.343.9800 Attorneys and Counselors At Law